

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

STEVEN REYNOLDS

Defendant(s)

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Case No. 5:18-mj-410 (ATB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

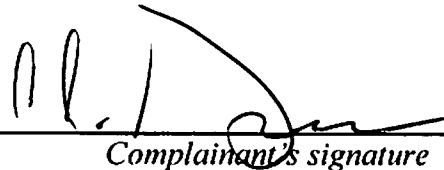
On or about the date(s) of on or about May 31, 2018 and June 1, 2018 in the county of Cayuga in the Northern District of New York the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in Possession of a Firearm

This criminal complaint is based on these facts:  
See attachment

☒ Continued on the attached sheet.



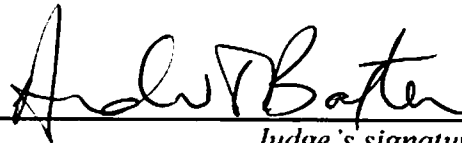
Complainant's signature

Colin Grosser, SA ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: July 19, 2018



Judge's signature

City and State: Syracuse, New York

Hon. Andrew T. Baxter, U.S. Magistrate Judge

Printed name and title

I, Colin Grosser, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been since November 2000. I am assigned to the Syracuse Field Office, New York Field Division. I am a graduate of the ATF National Academy and the Criminal Investigator School located at the Federal Law Enforcement Training Center in Glynco, Georgia. I further state that I am the kind of Special Agent as delineated in Title 18, United States Code, Section 3051. My primary duties as an ATF Special Agent include investigating violations of federal firearms laws including illegal firearms trafficking, unlawful acquisition/ possession of firearms, and the possession of firearms during the commission of drug trafficking crimes and crimes of violence. Additionally, prior to becoming an ATF Agent, I was employed by ATF as an Inspector beginning in February 1999.

2. I am an investigative, or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7), that is, an officer of the United States who is empowered by law to conduct investigations of and make arrests for the offenses enumerated in Title 18 and 26, United States Code.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, local law enforcement officers, and their reports. This affidavit is intended to show merely that there is probable cause for the requested search warrants, and does not set forth all of my knowledge about this matter.

### Facts Establishing Probable Cause

1. This affidavit is based upon my personal knowledge and observations, as well as that of other ATF Agents and law enforcement officers. This affidavit contains information to support probable cause, but is not intended to convey facts of the entire investigation.
2. On May 31, 2018, Members of the Finger Lakes Drug Task Force (FLDTF) were conducting a surveillance at the parking lot of the Dollar General Store located at 343 Genesee Street, Auburn, NY when they observed an individual, later identified as Steven Michael REYNOLDS, DOB \*/\*/80, arrive in a black colored Subaru Outback bearing NY license plate DDD5777, which vehicle was registered to REYNOLDS' mother, Sally Bronson.
3. Investigators next observed another individual, later identified as Aaron Peters, arrive at the same parking lot in a black colored Jeep Grand Cherokee bearing NY license plate CLM9732, which vehicle had previously been reported as stolen to Auburn police.
4. FLDTF members then observed REYNOLDS go to the back of the Subaru and remove three (3) long-guns/shotguns/firearms from the rear of the vehicle and transfer them into the back of the (stolen) Jeep Grand Cherokee, which had backed up in the parking lot to the rear of the Subaru to facilitate the transfer. Peters assisted REYNOLDS by transferring an additional weapon (which appeared to be another long-gun/shotgun but was later determined to be a "Paintball gun" and not a firearm) from the Subaru to the Grand Cherokee.
5. After REYNOLDS and Peters completed transferring the items, the Jeep Grand Cherokee exited the plaza and police officers attempted to initiate a vehicle stop on the stolen Grand Cherokee but it failed to yield and attempted to flee the area. The Grand Cherokee turned

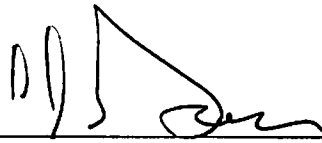
south onto Warren Avenue, where it struck a parked vehicle. The two occupants inside, Peters and another individual, fled on foot and were apprehended after a short foot pursuit. A Browning "Sweet Sixteen" 16 gauge shotgun (bearing serial number os-58681), and a Savage .308 rifle (bearing serial number J940801) were among the four firearms recovered from the Jeep Grand Cherokee.<sup>1</sup>

6. The following day, June 1, 2018, the Auburn Police Department confirmed that the Browning "Sweet Sixteen" 16 gauge shotgun and the Savage .308 rifle, both of which REYNOLDS had possessed on May 31, 2018, had previously been reported as stolen in a residential burglary.
7. Your affiant has confirmed that the Browning "Sweet Sixteen", 16 gauge shotgun, serial number 0S 58681, was manufactured in Belgium for the Browning Arms Company, St. Louis, MO. The Savage, model AXIS, .308 caliber rifle, serial number J940801 was manufactured in the state of Massachusetts by Savage Arms, Inc. Both firearms moved in/affected interstate/foreign commerce to arrive in New York.
8. Your affiant has reviewed criminal record databases and has confirmed that REYNOLDS has two (2) previous felony drug convictions from Cayuga County Court, having been convicted for Criminal Sale of a Controlled Substance (class B felony) on May 15, 2012, and having been convicted for Criminal Possession of a Controlled Substance with Intent to Sell (class D felony) on January 25, 2005.

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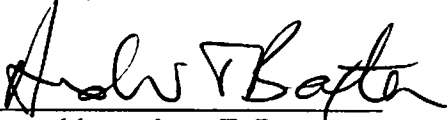
<sup>1</sup> Note: As stated above, a total of four (4) weapons were recovered from the Jeep. However, one of the four was a "black powder" rifle and another was a "paintball gun," neither of which constitutes a "firearm" under federal law. Therefore, the two (2) firearms REYNOLDS possessed as a felon are the Browning shotgun and the Savage .308 rifle, further described above.

9. Based on my training and experience, and the facts set forth in this affidavit, your affiant submits that probable cause exists that Steven Michael REYNOLDS is in violation of 18 U.S.C. §922(g)(1), being a felon in possession of one or more firearms, and requests that an arrest warrant for REYNOLDS be issued charging him with this violation of federal law.



COLIN GROSSER  
Special Agent ATF

Subscribed and sworn to before  
me this on this 19<sup>th</sup> day of July,  
2018 at Syracuse, New York



Honorable Andrew T. Baxter  
United States Magistrate Judge